



Ame LeCocq
Compliance Manager

📞 503.286.8352 800.367.8894 503.313.8275 (cell)
✉ 503.286.5027 amel@orrcobiz
📍 4150 N. Suttle Rd. • Portland, OR 97217



Fw: PCB Contamination
Daniel Duncan to: Bruce Long

05/05/2010 12:39 PM

From the Desk Of:
Daniel Duncan
Office of Compliance and Enforcement
(206) 553-6693
(206) 553-1775(FAX)

----- Forwarded by Daniel Duncan/R10/USEPA/US on 05/05/2010 12:39 PM -----

From: Ame LeCocq <amelecocq@gmail.com>
To: Daniel Duncan/R10/USEPA/US@EPA
Date: 02/26/2010 11:00 AM
Subject: PCB Contamination

Dear Mr. Duncan:

This email is a follow up from our phone conversation this morning.

I am in great need of your assistance, as well as Region 9 EPA. Our company, Oil Re-Refining Co., Inc. collects used oil from customers for processing and re-refining. We have a collection site in Salt Lake City, Utah. At this facility, oil is collected from various generators, then the oil is bulked in tanks until it can be transported to one of our processing facilities. A load was collected from SLC and shipped to our EMRI facility in Portland, OR. Then, it was shipped for processing to our facility in Klamath Falls, OR. The material was then processed into EPA Off-Specification Fuel Oil. A sample was collected from this material and shipped to an independent laboratory for testing. The sample came back with a result of 15ppm for PCB's. At that point, we sent out our retain samples from everything that had gone into that tank previously, and identified that it came from our EMRI facility - that retain tested at 230ppm. The EMRI facility was notified, shut down, and the retain samples were sent to the lab to attempt to identify which incoming drain oil load was contaminated. All retains into the tank tested non-detect, with the exception of the SLC load, which tested at 450ppm. We then tested the retains held in SLC, which were daily composites from each day the driver did his "milk run" collections from various generators. On January 20th, that retain tested at 270ppm (presumably this was lower because of the fact that only a small amount of oil from each stop was included in the drivers retain collection sample). We now have this material narrowed down to 5 possible generators, with one that seems the most probable. We immediately contacted EPA for assistance, and also called Utah DEQ to ask them for assistance in testing the possible customers. I was told by David Wheeler from Utah DEQ that "they do not offer that kind of service." This was told to him by the director of his department.

With no assistance from DEQ, we continued to attempt to contact EPA, which is when you and I spoke.

I understand that typically, PCB's are cleaned up based on the source concentration. However, I was wondering about the remediation waste "as-found" concentration clean up rule for our facilities that received this material. Could this be possible for us?

My immediate question is: I know that this will require a great effort to clean up and track. Is there any way that we could begin the clean up at our Portland facility ASAP?? We are currently shut down, but with the economy being what it is, if we do not begin operations sometime in the very near future, we will have to close, and 87 people will be out of a job. If we can contract with an outside company, such as CCS or West Coast Marine Cleaning (whom I understand are both licensed for this type of clean up), and begin cleaning that facility, we might have a chance of surviving this situation.

I will remain shut down, and await your advise.

Thanks,

Ame LeCocq

Compliance Manager

ORRCO

Office: 503-286-8352

Cell: 503-313-8275



Fw: PCB Contamination

Daniel Duncan to: Richard Mednick
Cc: Bruce Long

02/26/2010 12:53 PM

History: This message has been forwarded.

Richard:

Please let me know when you are available this afternoon to discuss this emerging used oil issue.

Thanks in advance,

From the Desk Of:
Daniel Duncan
Office of Compliance and Enforcement
(206) 553-6693
(206) 553-1775(FAX)

----- Forwarded by Daniel Duncan/R10/USEPA/US on 02/26/2010 12:52 PM -----

From: Ame LeCocq <amelecocq@gmail.com>
To: Daniel Duncan/R10/USEPA/US@EPA
Date: 02/26/2010 12:26 PM
Subject: Re: PCB Contamination

Dear Dan:

My proposal would be for us to contact CCS or West Coast Marine (or both perhaps) and inform them that we need to begin cleaning every tank, line, and truck that has come into contact with this oil, even if the test results for said tanks now contain less than 50ppm (the clean up is based on source concentrations). The material would be transported by Clean Harbors to their Aragonite, UT facility, which from what I understand is licensed to accept these materials for disposal.

If you were to approve this plan for our facility, we could begin clean up as soon as tomorrow. The facility is located at 11535 North Force Avenue, Portland, OR. I know that our Klamath Falls facility has been infected as well, and they too will undergo the same type of clean up, but our heart of production is our re-refinery in Portland. If we can begin there, then we may have a chance of staying in business.

I will call Mr. Rollins to discuss the SLC facility immediately. Can you consider the proposal listed above? If there is a different route you would prefer, we are open for suggestions.

Thank you,
Ame

On Fri, Feb 26, 2010 at 11:51 AM, <Duncan.Daniel@epamail.epa.gov> wrote:

Ame:

What is your proposal to decontaminate the tank(s) which contain(s) the drain oil from the PCB source at ≥ 50 ppm ?

Is this for your facility ORRC in Portland, OR ?

This oil will need to be incinerated since it has come from a source \geq 50 ppm PCBs.

You will need to contact Christopher Rollins of R9 to discuss the Salt Lake Facility in Utah. He can be reached at
(415) 947-4166.

Sincerely,

From the Desk Of:
Daniel Duncan
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